

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
ROMAN LAFLECHE,  
Defendant.

2:24-CR-019-JAD-BNW

## **Preliminary Order of Forfeiture**

This Court finds Roman Lafleche pled guilty to Counts One and Two of a Two-Count Criminal Indictment charging him in Count One with possession of child pornography in violation of 18 U.S.C. § 2252A(a)(5)(B) and in Count Two with receipt or distribution of child pornography in violation of 18 U.S.C. § 2252A(a)(2). Criminal Indictment, ECF No. 1; Change of Plea, ECF No. 25; Plea Agreement, ECF No. 24.

This Court finds Roman Lafleche agreed to the forfeiture of the property set forth in the Plea Agreement, the Bill of Particulars, and the Forfeiture Allegation of the Criminal Indictment. Criminal Indictment, ECF No. 1; Bill of Particulars, ECF No. 5; Change of Plea, ECF No. 25; Plea Agreement, ECF No. 24.

This Court finds, under Fed. R. Crim. P. 32.2(b)(1) and (b)(2), the United States of America has shown the requisite nexus between property set forth in the Plea Agreement, the Bill of Particulars, and the Forfeiture Allegation of the Criminal Indictment and the offenses to which Roman Lafleche pled guilty.

The following property is any visual depiction described in 18 U.S.C. § 2252A, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation

1 of 18 U.S.C. § 2252A(a)(2) and 2252A(a)(5)(B) and any property, real or personal, used or  
2 intended to be used to commit or to promote the commission of 18 U.S.C. § 2252A(a)(2)  
3 and 2252A(a)(5)(B) or any property traceable to such property and is subject to forfeiture  
4 under 18 U.S.C. § 2253(a)(1) and 2253(a)(3):

- 5 1. a Lenovo Laptop Computer, model number 81T2, serial number PF1K456L,  
6 with an Intel 256GB PCIe-NVMe Solid State Hard Drive (model  
7 SSDPEKKW256B, serial number BTHH84760PDM256B); and  
8 2. a Seagate BarraCuda 1TB Hard Drive (model ST1000LM049, serial number  
9 WGS5V38H)

10 (all of which constitutes property).

11 This Court finds that on the government's motion, the Court may at any time enter  
12 an order of forfeiture or amend an existing order of forfeiture to include subsequently  
13 located property or substitute property under Fed. R. Crim. P. 32.2(e) and 32.2(b)(2)(C).

14 This Court finds the United States of America is now entitled to, and should, reduce  
15 the aforementioned property to the possession of the United States of America.

16 NOW THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND  
17 DECREED that the United States of America should seize the aforementioned property.

18 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED all possessory  
19 rights, ownership rights, and all rights, titles, and interests of Roman Lafleche in the  
20 aforementioned property are forfeited and are vested in the United States of America and  
21 shall be safely held by the United States of America until further order of the Court.

22 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the United States  
23 of America shall publish for at least thirty (30) consecutive days on the official internet  
24 government forfeiture website, www.forfeiture.gov, notice of this Order, which shall  
25 describe the forfeited property, state the times under the applicable statute when a petition  
26 contesting the forfeiture must be filed, and state the name and contact information for the  
27 government attorney to be served with the petition, under Fed. R. Crim. P. 32.2(b)(6).

28 Notice is served on any individual or entity on the date when it is placed in the mail,

1 delivered to a commercial carrier, or sent by electronic mail under Fed. R. Crim. P.  
2 32.2(b)(6)(D) and Supplemental Rule G(4)(b)(iii)-(v).

3 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that any individual  
4 or entity who claims an interest in the forfeited property must file a petition for a hearing to  
5 adjudicate the validity of the petitioner's alleged interest in the property under 21 U.S.C.  
6 § 853(n)(2), which petition shall be signed by the petitioner under penalty of perjury under  
7 21 U.S.C. § 853(n)(3) and 28 U.S.C. § 1746, and shall set forth the nature and extent of the  
8 petitioner's right, title, or interest in the property, the time and circumstances of the  
9 petitioner's acquisition of the right, title or interest in the property, any additional facts  
10 supporting the petitioner's claim, and the relief sought.

11 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a petition, if any,  
12 must be filed with the Clerk of the Court, 333 Las Vegas Boulevard South, Las Vegas,  
13 Nevada 89101, within thirty (30) days of the final publication of notice on the official  
14 internet government forfeiture site, [www.forfeiture.gov](http://www.forfeiture.gov), or his receipt of written notice,  
15 whichever is earlier.

16 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED a copy of the  
17 petition, if any, shall be served upon the Asset Forfeiture Attorney of the United States  
18 Attorney's Office at the following address at the time of filing:

19 Daniel D. Hollingsworth  
20 Assistant United States Attorney  
Misty L. Dante  
21 Assistant United States Attorney  
501 Las Vegas Boulevard South, Suite 1100  
22 Las Vegas, Nevada 89101.

23 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED the notice  
24 described herein need not be published in the event a Declaration of Forfeiture is issued by  
25 the appropriate agency following publication of notice of seizure and intent to  
26 administratively forfeit the above-described property.

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1 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Clerk send  
2 copies of this Order to all counsel of record.

3 DATED September 20, 2024.  
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5   
6 JENNIFER A. DORSEY  
7 UNITED STATES DISTRICT JUDGE  
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